IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

IN RE INTEL CORP. MICROPROCESSOR ANTITRUST LITIGATION))) MDL No. 1717-JJF)
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PHIL PAUL, on behalf of himself and all others similarly situated,)))
Plaintiffs,) Civil Action No. 05-485-JJF
v.) CONSOLIDATED ACTION
INTEL CORPORATION,)) DM
Defendant.)))

CLASS PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF DOCUMENTS

The Class Plaintiffs respectfully move the Court, pursuant to Rule 37 of the Federal Rules of Civil Procedure, for an Order in the form submitted herewith compelling the Intel defendants to produce "foreign conduct" documents in their possession and withheld by them. The grounds for this motion are set forth in CLASS PLAINTIFFS' OPENING BRIEF, filed contemporaneously herewith.

Dated: October 30, 2006

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CERTIFICATE OF SERVICE

I, J. Clayton Athey, hereby certify that on this 30th day of October, 2006, I caused the foregoing CLASS PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF **DOCUMENTS** to be served on the following counsel via electronic filing:

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